

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ASSURANCE COMPANY OF AMERICA,
A New York Corporation,

Plaintiff,

-vs-

Case No. 06-CV-13371

Hon.: Arthur Tarnow

Magistrate Judge Steven Pepe

LAVDAS JEWELRY LIMITED, A
Michigan Limited Liability Corporation,

Defendant.

MICHAEL J. BLACK (P10937)
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STUART A. SKLAR (P38146)
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DEFENDANT LAVDAS JEWELRY LIMITED'S WITNESS LIST

_____**NOW COMES** Defendant, Lavdas Jewelry Limited, by and through their attorneys,

**FIEGER, FIEGER, KENNEY, JOHNSON & GIROUX, P.C. , and FABIAN SKLAR &
KING, P.C.** and state for their Witness List states as follows:

1. All parties to the lawsuit;

2. Nicholas Lavdas;
3. Maria Lavdas;
4. Tony Scargall - father-in-law;
5. Dennis Scargall - uncle;
6. Cynthia Kendall-Lowe - employee;
7. Jennifer Rocheleau-Langreet - employee;
8. Graziella (Grace) Donofrio - employee;
9. Aannalisa Lamiliza - employee;
10. Sheryl Stopczynski - employee;
11. Pamela Fox - employee;
12. Amanda Glaros - employee
13. Kristen Grzybowski - employee;
14. Emad Abdulghani - employee;
15. Justin Perry - employee;
16. Katherine Beauvais - employee;
17. Patrick Flanagan - Assurance Company of America;
18. Craig Becker - Globe Midwest/Adjusters International (Potential Expert regarding damages, policy coverage and claims handling practices);
19. Chris Mills - insurance agent;
20. Patrick Green - insurance agent;
21. John Green - friend;
22. Jerry Youkelson - customer;

23. Sean Campeau - employee of Lavdas Limousine;
24. Carmen Pohorily - employee of Lavdas Limousine;
25. Michelle Kedrow - Friar Tuck's Manager;
26. T.J. Strickland - Investigator for Zurich/Assurance
27. Pjeter Berishic - suspect;
28. Simon Berishic - suspect;
29. Gjon Gjurashaj - suspect;
30. Henri Sumyk - FBI;
31. Juan Herrera - FBI;
32. Russell Salyers - Warren EMS;
33. Warren EMS - Brinkman (Douglas);
34. Paul Sinda - Warren EMS;
35. Warren EMS - May;
36. Any and all personnel who consulted, treated and/or cared for Nicholas Lavdas at William Beaumont Hospital:
 - a. Dr. Christopher McPeak;
 - b. Dr. Hugh Kerr;
 - c. Dr. William Keye, Jr.; and,
 - d. Dr. Bradford Walters.
37. Warren Police Department, including but not limited to:
 - a. Ron Visbara
 - b. Det. Kevin Woods
 - c. Det. Brendan Brosnan;
 - d. Daryl Tempest
 - e. Daniel Bozek;
 - f. Joseph Ballinger;
 - g. Daniel Novak;

- h. Frank Gasser;
 - i. William Reichling;
 - j. Michael Caruso;
 - k. Michael Kireta;
 - l. Randy Costanzo;
 - m. Jeffrey Knoblauch;
 - n. Kathleen Miller;
 - o. Eric Schulz;
 - p. Robert Schaffner;
 - q. Richard Bewley;
 - r. Timothy Maniere;
 - s. Paul Westrick;
 - t. Brian Gilchrist;
 - u. Det. Klik;
 - v. Carole Yustick;
 - w. Lillian Smolinski;
 - x. Capt. Mazzonne;
 - y. Lt. Stano; and,
 - z. Det. Keitz.
38. James Zender, Ph.D. - treating physician;
39. Guardian Alarm, including but not limited to:
- a. Bill Hodges;
 - b. Joseph Fortuna;
 - c. Debra/Debi Carey;
 - d. Bess Kalergis-Reed (sic);
 - e. K. Majaski (sic);
 - f. Sandy Flaunoy (sic);
 - g. Jeff Nelson;
 - h. Flores/#694;
 - i. R. Kay (sic); and,
 - j. Employee #573.
40. Keeper of the Records for:
- a. Warren Police Department;
 - b. Warren EMS;
 - c. FBI/Federal Bureau of Investigation;
 - d. William Beaumont Hospital;
 - e. James Zender, Ph.D., P.C.;
 - f. Dr. Tieghe;

- g. St. John Urgent Care;
 - h. Michigan Institute of Urology;
 - i. Henry Ford Hospital;
 - j. Cincinnati Insurance Company;
 - k. Retailers Mutual Insurance Company;
 - l. Globe Midwest/Adjustors International;
 - m. Guardian Alarm of Michigan;
 - n. Assurance Company of America/Zurich; and,
 - o. Zurich Insurance/Assurance Company of America.
- 41. Cincinnati Insurance Company Claim Representative;
 - 42. Retailers Mutual Insurance Company Claim Representative;
 - 43. Globe Midwest/Adjusters International Claim Representative;
 - 44. Assurance Company of American Claim Representative;
 - 45. Assurance Company of American Claim Representatives past and present including but not limited to adjustors and investigators;
 - 46. Zurich Insurance Claim Representative;
 - 47. Dr. Michael Thomson - Economic Expert
2350 Franklin Road, Suite 200, Bloomfield Hills, MI 48302;
 - 48. Any and all rebuttal witnesses as necessary;
 - 49. Any and all witnesses learned through the course of continued discovery whose names are not identified at this time;
 - 50. Plaintiff reserves the right to supplement and amend this witness list to reflect new witnesses learned throughout discovery; and,
 - 51. Any and all witnesses listed on Defendants' Witness List, whether called at the time of trial or not.
 - 52. Defendant's experts;
 - 53. All witnesses named or referred to in interrogatory answers, depositions, any and all pleadings, investigations and/or claims files or referred to in documents maintained or produced by all parties;

- 54. Any witness who may have been retained by other parties, whether or not called at the time of trial;
- 55. Custodian of records for any witnesses list by any party to this action;
- 56. Any and all witnesses that become known to Defendant through the course of this litigation;
- 57. All parties to this action, their employees, agents, and representatives under the adverse witness rule where applicable; and,
- 58. Plaintiff reserves the right to name additional lay and expert witnesses through and including the time of trial in this matter.

Respectfully submitted,

Fieger, Fieger, Kenney, Johnson & Giroux, P.C.

By: /s/ Ven R. Johnson

VEN R. JOHNSON (P39219)

Attorneys for Plaintiffs/Counter Defendant
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Dated: July 30, 2007

PROOF OF SERVICE

The undersigned hereby certifies that on July 30, 2007, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: Michael J. Black and Stuart Sklar and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: none.

/s/ Ven R. Johnson

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